

STEFANO PÉREZ, ESQ.

New York State Assembly, LOB 722, Albany, NY 12248 | 518-455-4685 | perezs@nyassembly.gov

March 6, 2025

VIA ECF

Hon. Lewis J. Liman
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: Blumencranz v. Hochul, et al.,
25-CV-1787 (LJL) (BCM)

Your Honor,

I represent Plaintiff Assemblyman Jake Blumencranz (hereinafter “Plaintiff”) in the above-referenced matter. By way of background, Plaintiff filed the instant Complaint on March 3, 2025. See Docket No. 1. By letter dated March 5, 2025, Roberta A. Kaplan, counsel¹ for Defendants Metropolitan Transportation Authority (“MTA”), and Triborough Bridge and Tunnel Authority (“TBTA”) filed a letter requesting that this matter be reassigned to Your Honor from Hon. Vernon S. Broderick, United States District Court Judge for the Southern District of New York, purportedly arguing relatedness of the instant matter with other matters filed within this Court.²³ See Docket No. 8.

While Plaintiff does not agree with nor concede the issue of relatedness of the instant matter with those cited by the above-referenced letter by Roberta A. Kaplan, each of which predate the instant matter and rely on distinct legal reasoning, Plaintiff acknowledges the Court’s ruling and will proceed in accordance with its decision. See Docket entries entered on March 6, 2025.

Plaintiff’s focus remains on obtaining a fair adjudication on the merits, and intends on litigating this case efficiently before Your Honor. That said, Plaintiff categorically disputes Defendants’ MTA and TBTA unfounded and misleading claim that counsel may have engaged in improper “judge shopping.” The case was filed in the ordinary course and assigned through the standard random case assignment process.

¹ Attorneys Roberta A. Kaplan, D. Brandon Trice, and Maximilian T. Crema filed separate notices of appearances on behalf of Defendants MTA and TBTA. See Docket Nos. 5, 6, and 7.

² The matters relied on by Defendants MTA and TBTA to demonstrate purported “relatedness” include: Chan v. U.S. Dep’t of Transp., No. 23 Civ. 10365 (LJL); Mulgrew v. U.S. Dep’t of Transp., No. 24 Civ. 1644 (LJL); New Yorkers Against Congestion Pricing Tax v. U.S. Dep’t of Transp., No. 24 Civ. 367 (LJL); Trucking Ass’n of N.Y. v. Metro. Transp. Auth., 24 Civ. 4111 (LJL); and Metro. Transp. Auth. v. Duffy, No. 25 Civ. 1413 (LJL).

³ Defendants Governor Kathy Hochul, MTA, and TBTA have yet to be served with process pursuant to Rule 4 of the Federal Rules of Civil Procedure.

STEFANO PÉREZ, ESQ.

New York State Assembly, LOB 722, Albany, NY 12248 | 518-455-4685 | perezs@nyassembly.gov

At no point did Plaintiff's counsel seek to manipulate or influence judicial assignment, nor was there any obligation to designate this case as related. It is, in fact, Defendants MTA and TBTA—not Plaintiff—who actively sought reassignment to a specific judge, undermining their own accusations. Plaintiff remains committed to advancing his claims in a manner that is both efficient and consistent with the Court's directives.

Accordingly, Plaintiff looks forward to a fair adjudication of his claims before this Court.

Thank you for your consideration herein.

Respectfully submitted,

*S/ Stefano Pérez*_____

Stefano Pérez, Esq.

*Attorney for Plaintiff Assemblyman Jake
Blumencranz*

VIA ECF

- cc: Hon. Vernon S. Broderick
United States District Judge
United States District Court, Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007
- cc: Honorable Barbara Moses
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312
- cc: Honorable Katharine H. Parker
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 750
New York, New York 10007-1312
- cc: Roberta A. Kaplan
D. Brandon Trice
Maximilian T. Crema
*Counsel for Defendants the Metropolitan Transportation Authority and Triborough Bridge
and Tunnel Authority*